

implementation and dismantling of fixed signaling equipment at protected premises. If a new license had to be issued each time an alarmed premise was added or deleted, the licensing burden would be significantly increased for both the alarm industry and the Commission.

The proposed Part 88 rules state that the separation between the control point and the center of the antenna may not exceed 25 feet. Thus, an offset channel mounted on a tower that is controlled from some other locations, e.g., by wirelines, may not meet this requirement. And in certain metropolitan areas, there may be no antenna sites low enough to meet this restriction, because of building heights. Thus, the proposed antenna restrictions for offset frequency operation may prove unworkable in many areas of the country. To the extent that offsets will remain usable at all in e.g., rural areas, the Commission should retain the current antenna height rule. However, in light of the fact that offset ~~frequencies will now be relatively useless for alarm~~

In particular, it is urged that co-primary fixed signaling operations be licensed for a given geographic radius, within which the licensee could establish fixed transmitters operating at 2 watts or less, which would be classified as "mobiles", without additional licensing. The antenna could be located up to 20 feet above any man-made structure. Under this approach, no Federal Aviation Administration (FAA) antenna clearance issues would be raised, and the Commission would not have to process hundreds of thousands of applications for low power signaling devices. It is respectfully submitted that continuation of this flexible licensing approach would best serve the public interest.

IV. THE COMMISSION SHOULD CLARIFY ITS INTENT TO RETAIN THE EXCLUSIVE ALLOCATION OF CENTRAL STATION ALARM FREQUENCIES

Existing Part 90 reservation of a few frequencies for exclusive central station alarm use partially fulfills expectations that spectrum be allocated to "put safety first." Special conditions 27 and 28 of Rule Section 90.75(c) state in part that the reserved central station frequencies, "may be used only by persons rendering a central station commercial protection service," as defined at Rule Section 90.75(c)(27). 47 C.F.R. § 90.75(c)(27).

However, the proposed Part 88 rules, if implemented as drafted, may have the unanticipated effect of putting safety last. Proposed Rule Section 88.733 could be construed to

limit central station alarm services to operation on certain frequencies, but it could also be construed to allow co-channel licensing of other, potentially incompatible operations. The proposed Rule Section 88.733 may operate as a limitation on, rather than a protection for central station alarm services. Likewise, it is not clear whether the heading captioned "Limitations" appearing in proposed Rule Section 88.617 limits the allowed use of the frequencies to central station alarm, or whether the eligibility of the specific user has been limited (i.e., central station alarm operation are limited to these frequencies).

Likewise, proposed Rule Section 88.617 could be interpreted to limit central station alarm services to certain frequencies, while also allowing co-channel licensing of other, potentially incompatible users.

Discussion of counsel for AICC with the Commission's staff, during the Private Radio Bureau's March 1, 1993 public forum on issues concerning the proposed rewrite, indicates that the Part 88 drafters intend these proposed rules to continue the present exclusive reservation of frequencies for central station alarm operations, including the new channels that would be created by splitting the current central station allocation. Thus, it is intended that the current Part 90 policy be continued. In order to more fully implement the drafters' intention, and to simplify the proposed rules, it is respectfully submitted that

clarification of this intent would be helpful. AICC accordingly requests that another sentence be added to the end of the text for Rule Section 88.617, so that the rule reads as follows:

§ 88.617 Non-Commercial Radio Service Frequencies

The following 4 frequencies below 25 kHz, 318 frequencies in the 25-50 MHz band, 581 frequencies in the 150-174 MHz bands, 420 frequency pairs in the 450-470 MHz band, 16 simplex frequencies in the 450-470 MHz band, 50 frequency pairs in the 806-821/851-866 MHz band and 99 frequency pairs in the 896-901/935-940 band are available. Use of these frequencies is restricted to any uses indicated by the column captioned "Limitations."

In addition to the above change to the introductory text of the rule, the following notation should be printed in the margin to the right of each of the channels which are to be made available for central station use: "Reserved for central station use only."

Insertion of the above language would more precisely implement the drafters' stated intention, would conserve Commission resources spent on processing unqualified applicants who misconstrue the current, terse limitation language, and would help to fulfill expectations that the Commission "put safety first" as its cardinal principle in frequency allocation.

V. THE COMMISSION SHOULD REJECT THE PROPOSED POWER AND ANTENNA HEIGHT LIMITATIONS

Imposing severe restrictions on output power or effective radiated power (ERP); shrinking the protected

service area; and limiting allowed antenna height for offset frequencies, would not reduce the actual service area of most licensees, as apparently anticipated. Most private radio licensees, especially central station alarm operators, need to provide radio coverage over all or most of the geographic area now served.

Thus, implementation of proposed limitations on output power or ERP and shrinking of protected service areas, as well as limitations on antenna height for central station offset frequencies, instead would prompt a scramble to cover existing service areas with multiple transmitter sites in place of one. The predictable results would be submission of numerous license applications for new stations, an increase in licensing litigation, forced unbudgeted procurement of additional and duplicative transmitters, and shortages of antenna sites, resulting in excessively high rentals for those available. Even then, a lack of intervening sites, and related licensing problems may prevent the user from ever achieving the same coverage.

This unwelcome development would unnecessarily strain the Commission's resources. Application processing demands would increase as licensees apply for licenses to cover existing service areas. Moreover, demands that the Commission adjudicate licensing disputes may skyrocket. The proposed shrinkage of protected service areas provides a potential gold mine for the ever present group of

"entrepreneurs" who capitalize on licensing mishaps, possibly prompting a new round of "strike application" litigation. All of this diverts Commission resources from other more productive endeavors.

The proposed power and antenna height limitations also impose unnecessary costs on licensees. Two or three times as many transmitters as now are operating may have to be purchased to cover the same area. Antenna sites already are scarce, with availability of new sites constrained by zoning, environmental, terrain and adjacent channel interference considerations. The approximate tripling or quadrupling of demand for antenna sites, with already limited supply would have the predictable consequence of multiplying available tower rents many times over.

The above costs would mount quickly. In order to comply by 1996 with new power and antenna height limitations and still cover the same geographic areas, the central station alarm operators, and other licensees would be required to: (1) apply for a new license or licenses, (2) possibly incur significant expenses to defend the applications or grants, (3) purchase at least twice as many transmitters, antennas and related equipment as currently operated, (4) rent at least twice as many antenna sites. This may be prohibitively expensive for many licensees. Added to these costs is the stranded investment incurred by those licensees who entered into long term leases for prime mountain-top sites, who must

abandon the site and instead utilize several lower-powered operations located closer to the intended users.

AICC urges continuation of the same output power, ERP and antenna height limitations as are presently enforced in Part 90 of the Commission's rules. If any power restrictions are to be adopted, less onerous alternatives should be considered. While the Commission is concerned that some private radio operations use more power than necessary to accomplish their communications objectives, the solution is not to punish the entire industry with the detrimental consequences described above. Instead, the Commission should enforce current Rule Section 90.206, 47 C.F.R. § 90.206, requiring applicants to request no more power than necessary, and should require the use of directional antennae where omnidirectional coverage is not shown to be needed. However, the Commission should recognize that certain operations (including central stations) often must communicate with several remote sites often spread over a wide geographic

VI. THE COMMISSION SHOULD RETAIN THE DEFINITION OF CENTRAL STATION ALARM

In order to ensure the most effective use of central station operations, the alarm industry has established quality standards and minimum operational capabilities for central stations. These requirements have been codified in the standard-setting processes of the Underwriters Laboratories (UL) and other recognized rating agencies. The standards enforced by these agencies have been recognized by the Commission as useful in precluding the use of scarce central station frequencies by operations not capable of providing reliable alarm services. Thus, current Rule Section 90.75(c)(27) appropriately states,

Central Station commercial protection service is defined as an electrical protection and supervisory service rendered to the public from and by a central station accepted and certified by one or more of the recognized rating agencies, or the Underwriters Laboratories' (UL), or Factory Mutual System.

This definition of central station service should likewise be incorporated into Part 88. By making reference to recognized rating agencies, the Underwriters Laboratories, or Factory Mutual System, this definition removes the Commission from accreditation problems, and recognizes generally accepted industry standards. This not only helps to protect the public from deficient alarm services (the inadequacy of which will only be discovered when disaster

Competing applications and/or the unavailability of intermediate antenna sites may frustrate this effort.

strikes), but also allows the alarm industry to meet requirements imposed by insurance companies. The insurance industry requires a standard of service quality to be met before extending coverage to many businesses.

Proposed Rule Section 88.733 omits the above quoted definition. However, the above definition advances Commission objectives, and reduces the Commission's administrative burden. Therefore, it would further the public interest to continue current Commission practice by including the above quoted language at the end of the text for Proposed Rule Section 88.733(a).

Retaining this definition of central station service would also help ensure that the central station frequencies are not occupied by radio operators that label themselves as "central stations" but should be required to use other spectrum. For instance, companies may design communications systems designed to link together various offices on a university or business park campus, and may try to classify such operation as a central station because it could arguably be used by the campus security force. Other such inappropriate uses could likewise attempt to exploit the frequencies appropriately reserved for the vital public safety functions provided by UL-listed central station operations.

VII. THE COMMISSION SHOULD ELIMINATE THE PROPOSAL TO REQUIRE FULL LOADING BEFORE COORDINATION OF A CLEAR CHANNEL

The Commission should not adopt the proposed requirement that frequency coordinators "stack" a channel to its maximum

loading capacity before recommending licensing on a fresh channel. In nearly all rural, and in many urban areas, the proposed vertical stacking requirement would have the anomalous effect of increasing congestion on used frequencies, while leaving fallow unused frequencies. This anomalous result contradicts the objectives normally pursued by Commission management of the spectrum, and by refarming.

It is intended that Commission rules encourage active use of the spectrum. To this end, a primary Commission objective has been to prevent warehousing of frequencies, i.e., withholding from public use frequencies that otherwise would be available. However, the proposed vertical channel stacking amounts to Commission warehousing of frequencies, since the Commission would require coordinators to withhold channels that otherwise would be available. From the users' perspective, it matters not whether warehousing is accomplished by private speculators, or by the regulatory agency. Regardless of who performs the warehousing, the result is that the public is deprived use of valuable frequencies that otherwise would be available. The PLMRS would have its own "vast wasteland", especially outside of the largest markets.

This would obviously contradict the objective of full use of the spectrum through Commission management. As the Commission itself has noted in a slightly different context, "[i]f this authorized frequency is put into use, even at low

levels of use, the frequency is being used more efficiently than if it were left unassigned." First Report and Order, 89 F.C.C. 2d 1337, 1352 (1982) (allowing assignment of one paging frequency per carrier per market without previously required showing of need). Thus, full spectrum assignment, as allowed in the current Part 90 frequency coordination rules, represents the more prudent policy choice.

Possibly the most immediate effect of proposed Part 88

related purpose (such as alarm operations), which purpose would be jeopardized by delays in access due to unnecessarily imposed channel crowding.

**VIII. THE COMMISSION SHOULD REDESIGNATE CENTRAL
STATION ALARM SERVICES INTO THE PUBLIC
SAFETY POOL**

Disparate assignments placing municipal dispatch centers in one radio service (Public Safety) while assigning central station alarm activities to a lesser radio service (Non-commercial) do not match the actual performance by safety related entities. Functionally, the two radio operations are often seamless, since central station alarm signals feed into the municipal dispatch centers. As noted above, central station alarm services deliver the front line of municipal police, fire or ambulance protection for many businesses and residences. To those businesses and residences, central station dispatch signals (proposed Part 88 Non-commercial Radio Service) are indistinguishable in consequence from the Public Service Radio Service transmission which follow through to dispatch the police, fire or ambulance service. Likewise, the Act does not distinguish on the basis of the type of entity providing a radio service, or whether the entity is a part of the regional public safety plan, but simply makes promoting safety a priority.

Placing central station operations into the Public Safety Pool would eliminate the need for cumbersome interservice coordination, which adds unnecessary delay and expense to the

interconnection of alarm signals to municipal dispatch centers. The Commission has recently expanded the Public Safety Radio Service to include private entities that likewise regularly work with governmental service providers, by creating the Emergency Medical Radio Service (EMRS) in PR Docket No. 91-72. Private entities providing ambulance and other emergency medical-related services can be licensed in the EMRS by obtaining certification from the local government.

Thus, classification of central station alarm operations as part of the Public Safety Radio Service would promote public safety by insuring the highest priority of transmission for the complementary governmental-private security forces. AICC accordingly requests assignment to the Public Safety Radio Service, subject to several conditions. First, central station operations would bring the currently allocated reserved frequencies into the Public Safety Radio Service, so that there would be no diminution of spectrum available to governmental users of the Service. Second, central station alarm services would not be eligible for additional frequencies created from narrowbanding of the current Public Safety Radio Service channels, and other eligible members of the Service would not be eligible for central station channels. Again, there would be no change in the amount of spectrum available to existing eligibles of the Public Safety Radio Service. AICC proposes that the Central Station Alarm Association (CSAA) would retain sole power and responsibility

for frequency coordinating the central station spectrum, given the experience of CSAA in processing alarm applications, and so that there would not be any additional burden upon the Public Safety Pool coordinator. Thus, assignment of central station alarm services to the Public Safety Radio Service would not detract in any way from the ability of state and local governmental authorities to design and implement a regional safety plan.

Central station alarm services are an increasingly essential part of the public safety delivery system of municipal police, fire and ambulance services. Assignment to the same radio service would facilitate greater coordination and interconnection with that delivery system, thereby promoting the safety of life and property. As every state, county and municipal government struggles to overcome budget shortfalls, placing central station operations on a parity with the public safety radio operations they feed and strengthen would contribute to the overall safety of the public which the Commission seeks to protect.

IX. THE COMMISSION SHOULD PROVIDE A PUBLIC SAFETY EXCEPTION FOR THE EXCLUSIVE USE OVERLAY MECHANISM

The Commission proposes to implement an "exclusive use overlay" mechanism that would allow existing licensees to gain exclusive use of their frequency, or at least freeze further licensing on the channel where it is already shared with other users. In order to qualify for an exclusive use overlay (EUO)

grant, licensees would have to demonstrate sufficient loading of mobile units. The Commission notes in the NPRM (at para. 13) that "if user groups have a need to be provided a greater degree of exclusivity for certain types of systems, then they should explicitly state what the standards and eligibility requirements for expanded protection should be."

AICC strongly urges the Commission to adopt a proposed "public safety" exception, which would totally or partially exempt from the EUO loading requirements those entities that are rendering services directly related to public safety. The Commission should define those radio operations eligible for this exception so as to include central station operations, including fixed alarm signaling (which should be accorded co-primary status, as discussed above). The compelling public safety nature of central station operations is demonstrated above. Such exception is vital to ensure that safety related operations such as alarm signaling are not deprived of available channels by less important uses of radio.

With regard to the standard for awarding an EUO under the public safety exception, the Commission should endeavor to eliminate uncertainty by listing certain categories of entities that would be deemed to fulfill the requirements by the very nature of their operations. This list would not have to be all inclusive, but should clearly include such entities as police, fire and ambulance services, as well as any entity

meeting the definition of a central station alarm operation contained in the Commission's rules.⁷

For these operations, an EUO would be a useful mechanism for preventing the licensing of incompatible users on the same channel as the public safety-related operation. However, it may be appropriate under certain circumstances for these entities to be required to share their exclusive use channel with other users of the same classification, when no other appropriate spectrum is available. For instance, it may be feasible for a limited number of alarm companies to share a frequency, while these companies could not successfully operate if forced to share the channel with, e.g., a taxicab or waste removal operation. AICC recommends that the Commission develop a standard for such limited sharing by EUO holders by soliciting input from the appropriate frequency coordinator for the particular category of safety-related operations, as well as industry representatives. These sources could recommend an appropriate level of loading to allow limited sharing among a category of users, and could also identify at what point a single user should be given exclusive use of an entire channel.

With regard to central station operations, the Commission should clarify (in conjunction with awarding co-primary status to fixed alarm signaling) that fixed signaling central

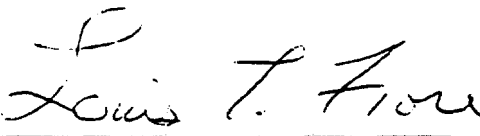
⁷ As discussed above, AICC advocates that the current definition of "central station" contained in Rule Section 90.75(c)(27)(28) be retained in the new rules.

stations that otherwise qualify for an EUO grant will not be secondary to mobile operations, even if the EUO is granted in a frequency band other than the channels reserved for central station operations. It is respectfully submitted that, if a central station proposing fixed signaling can provide a certification from the central station frequency coordinator, that no suitable central station frequencies remain in the area proposed, then this applicant should be awarded an EUO with co-primary status on any of the remaining available non-commercial or general category narrowband channels.

WHEREFORE, AICC respectfully requests that the Commission
adopt the foregoing recommendations in PR Docket No. 92-235.

Respectfully Submitted,

**THE ALARM INDUSTRY COMMUNICATIONS
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Filed: May 28, 1993

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16 PP

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